US ERA ARCHIVE DOCUMENT

080804

November 21, 1979

EPA Registration No. 100-582 Conquer Liquid Vegetation Killer, Caswell #704 C, 641

Sherell A. Sterling And To E 12/17/79
FHB/TSS

Robert Taylor Product Manager (25)

Applicant: Ciba-Geigy Corporation

Agricultural Division Greensboro, NC 27409

Acti	ve Ingredients:
080804-	Prometon
0/3001-	Pentachlorophenol1.00%
0,000	Other chlorophenols & related
	compounds0.12%
Tner	t Ingredients

Background:

The purpose of this submission is to amend the precautionary labeling on prometon products. Data submitted includes eleven Eye Irritation studies on different prometon formulations; and Acute Oral, Acute Dermal, Acute Inhalation, Eye (two) and Skin Irritation studies on Conquer LVK (HG 78225). The studies were conducted by International Research and Development (IRSD) Corporation, and Stillmeadow, Inc.

These data are in Accession No. 241191. The method of support was not indicated.

Recommendations:

- 1. Eye Irritation studies for the formulations HG 78113, HG 78114, HG 78115, HG 78116, HG 78117, HG 78118, HG 78119, HG 78120, HG 78121, HG 78122, and HG 78123 are Core Supplementary Data. These studies are supplementary since they differ from the formulation under consideration here (HG 78225).
- 2. The Acute Oral, Acute Dermal, Acute Inhalation, Eye and Licitor Irritation studies on HG 78225 are adequate and acceptable for registration purposes.
- 3. FHB/TSS objects to this registration amendment since it includes precautionary labeling revisions. Major labeling revisions such as this are not appropriate for amended registration. [40 CFR 162.6(c)(3)(i)(B)]

Comments:

- While this labeling revision is not acceptable for registration amendment, FHB/TSS would find such a product appropriate for new registration status.
- 2. The cause of death for animal #34080 in the Eye Irritation study of HG 78115 should be submitted.
- 3. Please verify that the animal #34153 in the Eye Irritation study of HG 78121 (page 303) is the same as that on page 315 with ear tag #5753.
- 4. Please verify that the chemosis score for animal #34170 in the Eye Irritation study of HG 78121 (page 313) is 3.0; individual score chart for this animal (page 316) shows a score of 2.0.
- 5. For the record we note that throughout the IR&D studies corneal opacity scores of 0.5 on the individual lab data sheets denote corneal dullness. Since corneal dullness is not scored under the Draize method, it was not scored in Tables 1-3 of the studies. Instead, corneal dullness has appropriately been listed under "Other Findings" in Table #1 of the IR&D studies.

E. Habiling comments use déferred unité such time de Review: application is made for new régistration.

1. Primary Eye Irritation Study in the Albino Rabbit - HG 78123; IR&D #382-033L; June 19, 1978.

<u>Procedure</u>: 0.1 ml of test material (HG 78123) was applied into one eye of each of 6 New Zealand white rabbits (no rinse). Scoring at 1, 24, 48, 72 hours; 7, 14 and 21 days.

Results: At 1 hour 6/6 very slight corneal opacity; 6/6 with iris irritation; 6/6 with slight conjunctival redness; 6/6 with moderate swelling/ chemosis; 6/6 with slight to moderate discharge. At 24 hours 5/6 showed corneal opacity, 1/6 with corneal dullness; 6/6 showed iris irritation; 6/6 showed slight conjunctival redness; 6/6 with slight to chemosis; 6/6 had slight to moderate moderate swelling/ discharge. At 7 days 5/6 showed slight to moderate corneal opacity; 4/6 showed iris irritation; 6/6 with slight to marked conjunctival redness; 6/6 with very slight to slight chemosis; 4/6 showed a slight to moderate swelling/ discharge. At 21 days, 5/6 exhibited very slight to moderate corneal opacity; iris irritation gone; 4/6 exhibited slight conjunctival redness; 3/6 with very slight swelling/ chemosis; 5/6 with very slight to slight discharge. Other findings included pannus, corneal peeling, conjunctival blanching, hair loss, purulent discharge, clear discharge, vascularization of corneal surface, corneal piling, corneal pitting, circumcorneal occlusion of corneal surface and vocalization following dosing.

Study Classification: Core Supplementary Data. This study does not directly support the amended registration of the HG 78225 formulation. The data, however, would place the HG 78123 formulation in toxicity category I. This is the currently registered formulation.

2. Primary Eye Irritation Study in the Albino Rabbit: HG 78113; IR&D #382-033B; June 19, 1978.

<u>Procedure</u>: 0.1 ml of test material (HG 78113) was applied into one eye of each of 6 New Zealand white rabbits, no rinse. Scoring at 1, 24, 48, 72 hours and 7 days.

Results: At 1 hour, 6/6 with normal corneas; no iris irritation; 5/6 with slight to moderate conjunctival redness, 6/6 with very slight swelling/ chemosis; 6/6 had very slight to slight discharge. At 24 hours, 2/6 showed iris irritation; 5/6 exhibited very slight to moderate conjunctival redness; 3/6 exhibited very slightly swollen chemosis; 2/6 showed very slight discharge. All eyes appeared normal by 7 days. Symptoms included clear and purulent discharge, conjunctival blanching.

Study Classification: Core Supplementary Data. This study does not directly support the amended registration of the HG 78225 formulation. The data, however, would place the HG 78113 formulation in toxicity category III.

3. Primary Eye Irritation Study in the Albino Rabbit: HG 78114; IR&D #382-033C; June 19, 1978.

<u>Procedure</u>: 0.1 ml of test material (HG 78114) was applied into one eye of each of 6 New Zealand white rabbits, no rinse. Scoring at 1, 24, 48, 72 hours and 7 days.

Results: No corneal involvement. At 1 hour 6/6 exhibited iris irritation; 6/6 with slight to moder to conjunctival redness; 6/6 with very slight to slight swelling/ chemosis; 6/6 with very slight to moderate discharge. At 24 hours 6/6 exhibited very slight to moderate conjunctival redness; 6/6 showed slight swelling/ chemosis. All scores were zero by 7 days. Symptoms included clear discharge, purulent discharge, conjunctival blanching and vocalization at instillation.

Study Classification: Core Supplementary Data. This study does not directly support the amended registration of HG 78225 formulation. The data, however, would place the HG 78114 formulation in toxicity category III.

4. Primary Eye Irritation Study in the Albino Rabbit: HG 78117; IR&D #382-033F; June 19, 1978.

<u>Procedure</u>: 0.1 ml of test material (HG 78117) was applied into one eye of each of 6 New Zealand white rabbits, no rinse. Scoring at 1, 24, 48, 72 hours, 7 and 14 days.

Results: No corneal involvement. At 1 hour, 1/6 exhibited iris irritation; 6/6 showed slight to moderate conjunctival redness; 6/6 showed very slight to slight swelling/ chemosis; 4/6 showed very slight to slight discharge. At 24 hours, 3/6 exhibited very slight to slight conjunctival redness; 3/6 very slight swelling/ chemosis; 1/6 very slight discharge. At 7 days, 1/6 showed slight conjunctival redness. All scores zero by day 14. Symptoms included clear discharge and purulent discharge.

Study Classification: Core Supplementary Data. This study does not directly support the amended registration of the HG 78225 formulation. The data, however, would place the HG 78117 in toxicity category III.

5. Primary Eye Irritation Study in the Albino Rabbit: HG 78118; IR&D #382-033G; June 19, 1978.

<u>Procedure</u>: 0.1 ml of test material (HG 78118) was applied into one eye of each of 6 New Zealand white rabbits, no rinse. Scoring at 1, 24, 48, 72 hours, and 7 days.

Results: No corneal involvement. At 1 hour, 1/6 showed iris irritation; 6/6 with slight to moderate conjunctival redness; 6/6 with very slight swelling/ chemosis; 3/6 with very slight to slight discharge. At 24 hours, 2/6 showed slight conjunctival redness. All normal by 48 hours. Symptoms included clear discharge, corneal pitting, vocalization upon instillation. 1M showed decrease in weight from day 0 to day 7.

Study Classification: Core Supplementary Data. This study does not directly support the amended registration of the HG 78225 formulation. The data, however, would place the HG 78118 in toxicity category III.

6. Primary Eye Irritation Study in the Albino Rabbit: HG 78119; IR&D #382-033H; June 19, 1978.

<u>Procedure</u>: 0.1 ml of test material (HG 78119) was applied into one eye of each of 6 New Zealand white rabbits, no rinse. Scoring at 1, 24, 48, 72 hours, and 7 days.

Results: No corneal involvement. At 1 hour, 3/6 had iris irritation; 6/6 exhibited slight to moderate conjunctival redness; 6/6 with very slight chemosis; 2/6 with very slight to slight discharge. At 24 hours, 3/6 showed very slight to moderate redness; 2/6 with very slight swelling/ chemosis; 1/6 with very slight discharge. All normal by 72 hours. Symptoms included clear discharge, and purulent discharge.

Study Classification: Core Supplementary Data. This study does not directly support the amended registration of the HG 78225 formulation. The data, however, would place the HG 78119 formulation in toxicity category III.

7. Primary Eye Irritation Study in the Albino Rabbit: HG 78115; IR&D #382-033D; June 19, 1978.

Procedure: 0.1 ml of test material (HG 78115) was applied into one eye of each of 6 New Zealand white rabbits, no rinse. Scoring at 1, 24, 48, 72 hours, 7, 14 and 21 days.

Results: At 1 hour, 1/6 with corneal dulling, 5/6 with very slight corneal opacity; at 24 hours, 1/6 with corneal dulling, 5/6 with very slight to slight corneal opacity; at 7 days 1/6 with dulling, 5/6 very slight to marked corneal opacity; at 14 days 2/6 with dulling, 1/6 with slight corneal opacity; at 21 days, 2/6 appeared normal, 1/6 with dulling, 3/6 with very slight to slight corneal opacity. Iris irritation at 1 hour in 4/6; 5/6 at 24 hours; 4/6 at 7 days; all scores 0 by day 14. Conjunctival redness at 1 hour in 6/6 was slight to moderate; 6/6 moderate redness at 24 hours; at 7 days, 6/6 very slight to moderate redness; at 14 and 21 days, 1/6 with slight redness. Slight to moderate swelling/

chemosis at 1, 24 hours in 6/6; at 7 days, 6/6 with very slight to slight swelling; at 14, 21 days 3/6 with very slight swelling. Discharge at 1 hour in 6/6 was moderate; at 24 hours 6/6 very slight to marked; at 7 days, 4/6 very slight to slight; all scores 0 by day 14. Symptoms included corneal peeling, vascularization of corneal surface, conjunctival blanching, clear discharge, purulent discharge, corneal pitting, pannus, corneal vesicle with ulceration, increased folds in iris; iris details indistinguishable, hair loss around eyes; corneal piling, vocalization upon dosing.

Study Classification: Core Supplementary Data. This study does not directly support the amended registration of the HG 78225 formulation. The data, however, would place the HG 78115 toxicity category I. Animal #34080 died; no explanation was given.

8. Primary Eye Irritation Study in the Albino Rabbit: HG 78116; IR&D #382-033E; June 19, 1978.

<u>Procedure</u>: 0.1 ml of test material (HG 78116) was applied into one eye of each of 6 New Zealand white rabbits, no rinse. Scoring at 1, 24, 48, 72 hours, and 7, 14 and 21 days.

Results: At 1 hour, 2/6 with corneal dulling, 3/6 showed very slight corneal opacity; at 24 hours, 3/6 with corneal dulling, 2/6 with slight opacity; at 7 days, 2/6 showed moderate opacity; at 14 days, 2/6 with very slight opacity; at 21 days, 1/6 with very slight opacity. At 1, 24 hours iris irritation in 6/6; at 7 days irritation in 2/6; all scores zero by day 14. At 1, 24 hours 6/6 showed moderate redness; at 7 days, 6/6 showed slight to moderate redness; at 14 days, 1/6 with slight redness; all scores zero by day 21. Swelling/ chemosis at 1 hour was slight in 6/6; at 24

hours, 6/6 showed from very slight to moderate swelling; at 7 days, 4/6 very slight, 1/6 moderate; at 14 days 1/6 slight, all scores zero by day 21. Discharge exhibited at 1 hour in 6/6 was moderate; at 24 hours, 4/6 showed moderate discharge; at 7 days, 1/6 had moderate discharge; all scores zero by day 14. Symptoms included corneal peeling, corneal piling, conjunctival blanching, vascularization of the corneal surface, clear discharge, purulent discharge, pannus, hair loss around eye.

Study Classification: Core Supplementary Data. This study does not directly support the amended registration of the HG 78225. The data, however, would place HG 78116 in toxicity category I.

9. Primary Eye Irritation Study in the Albino Rabbit: HG 78120; IR&D #382-0331; June 19, 1978.

Procedure: 0.1 ml of test material (HG 78120) was applied into one eye of each of 6 New Zealand white rabbits, no rinse. Scoring at 1, 24, 48, 72 hours, 7, 14 and 21 days.

Results: At 1 hour through 72 hours corneal opacity was very slight in 6/6; at 7 days, dulling in 1/6, with 5/6 showing slight to moderate opacity; at day 14, 5/6 had very slight to slight opacity; day 21, 1/6 with dulling, 4/6 very slight to slight opacity. Iris irritation in 5/6 at 1, 24 hours; 4/6 at 7 days showed iris irritation; 2/6 at 14 days and 6/6 at 21 days with irritation. At 1 hour, 6/6 showed slight conjunctival redness; at 24 hours, 6/6 slight to moderate redness; at 7 days, 6/6 very slight to moderate redness; at 14 days, 4/6 showed slight to moderate redness; at 21 days, 2/6 with slight redness. Swelling chemosis at 1 hour was slight to moderate in 6/6; at 24 hours, 6/6 showed moderate swelling; at 7 days, 6/6 with very slight to slight swelling; at 14 days 5/6 with very slight swelling and 1/6 showed very slight swelling at 21 days. Discharge in 6/6 at 1 hour was slight to moderate; at 24 hours 6/6 had moderate discharge; at 7 days 3/6 with slight discharge; at 14 days, 1/6 with slight discharge; all scores zero by day 21. Symptoms included corneal peeling, pannus, vascularization of the corneal surface, conjunctival blanching, hair loss around eye, purulent discharge, phlyctenar, clear discharge, corneal piling, vocalization upon dosing.

Study Classification: Core Supplementary Data. This study does not directly support the amended registration of the HG 78225 formulation. The data, however, would place the HG 78120 formulation in toxicity category I.

10. Primary Eye Irritation Study in the Albino Rabbit: HG 78121; IR&D #382-033J; June 19, 1978.

<u>Procedure</u>: 0.1 ml of test material (HG 78121) was applied into one eye of each of 6 New Zealand white rabbits, no rinse. Scoring at 1, 24, 48, 72 hours, 7, 14 and 21 days.

Results: At 1 hour, corneal dulling in 2/6, very slight opacity in 3/6; at 24 hours, 6/6 with very slight opacity; at 7 days, 1/6 with dulling, 5/6 with very slight to slight opacity; at 14 days, 3/6 with very slight to slight opacity; at 21 days, 1/6 with very slight and 1/6 with marked opacity. Iris irritation in 2/6 at 1 hour; 6/6 at 24 hours; 4/6 at 7 days; all scores zero by day 14. Conjunctival redness was slight in 6/6 at 1 hour; very slight to moderate in 6/6 at 24 hours; very slight to moderate in 5/6 at 7 days; slight in 2/6 at 14 days; slight in 1/6 at 21 days. exhibited in 6/6 from very slight to moderate at 1, 24 hours; 5/6 very slight to slight at 7 days; very slight 1/6 at 14, 21 days. Discharge at 1 hour was moderate in 6/6; slight to moderate in 6/6 at 24 hours; slight in 2/6 and marked in 1/6 at 7 days; slight in 1/6 at 14, 21 days. Symptoms included corneal peeling, corneal piling, pannus, conjunctival blanching, purulent discharge, vascularization of the corneal surface, hair loss around eye, clear discharge and granulation scar tissue with neovascularization.

Study Classification: Core Supplementary Data. This study does not directly support the amended registration of the HG 78225 formulation. The data, however, would place the HG 78121 formulation in toxicity category I. Please note the requested corrections listed under the Comments section of this memo.

11. Primary Eye Irritation Study in the Albino Rabbit: HG 78122; IR&D #382-033K; June 19, 1978.

<u>Procedure</u>: 0.1 ml of test material (HG 78122) was applied into one eye of each of 6 New Zealand white rabbits, no rinse. Scoring at 1, 24, 48, 72 hours, 7, 14 and 21 days.

Results: At 1, 24 hours, 5/6 exhibited very slight corneal opacity; at 7 days 6/6 showed very slight to slight opacity; at 14, 21 days, 3/6 showed very slight to slight opacity. Iris irritation at 1 hour in 4/6; 6/6 at 24 hours; 3/6 at 7 days; all appear normal by 14 days. Conjunctival redness was slight in 6/6 at 1 hour, 6/6 slight to moderate redness at 24 hours; 6/6 very slight to marked redness at 7 days; at 14,

21 days, 3/6 with slight redness. Swelling/ chemosis was slight to moderate in 6/6 at 1 hour; very slight to slight swelling in 6/6 at 24 hours, 7 and 14 days; very slight swelling in 3/6 at 21 days. Discharge was slight to moderate in 6/6 at 1, 24 hours; slight in 2/6 at 7, 14 days; very slight discharge in 1/6 at 21 days. Symptoms included corneal peeling, vascularization of the corneal surface, conjunctival blanching, pannus, corneal piling, hair loss around eye, petite hemorrhage in the conjunctivae, purulent discharge and vocalization upon dosing.

Study Classification: Core Supplementary Data. This study does not directly support the amended registration of the HG 78225 formulation. The data, however, would place the HG 78122 formulation in toxicity category I.

12. Rat Oral Toxicity; Stillmeadow Project #1017-79; February 19, 1979.

Procedure: Groups of 5M, 5F Sprague-Dawley rats (205-290 g) received oral dosages of the test material (HG 78225) at levels of 1504, 2034, 2742, 3700 and 4999 mg/kg. Animals were observed for 14 days. At termination of study, survivors were sacrificed and all animals were subjected to a gross necropsy.

Results: No mortalities at 1504, 2034 mg/kg; at 2742 mg/kg 2/5M, 5/5F died; at 3700 mg/kg 3/5M, 3/5F died; at 4999 mg/kg 4/5 M, 5/5 F died. LD₅₀ for M subjects was 3310 mg/kg with a confidence range of 2459-4455 mg/kg. LD₅₀ for F subjects was 3210 mg/kg with a confidence range of 2649-3890 mg/kg. Symptoms included polyuria, difficult and labored breathing, nasal discharge, decrease in activity, chromodacryorrhea, epistaxis, piloerection, salivation, ataxia, lacrimation. Necropsies revealed one subject with small testis, discoloration of the abdominal fat, stomach adhered to other tissues, discoloration of the stomach and intestinal mucosa and contents, gastrointestinal tract distended with gas, discoloration of the mesenteric lymph nodes, and discoloration of the liver.

Study Classification: Core Guideline Data.

Toxicity Category: III - CAUTION

13. Rabbit Acute Dermal Toxicity; Stillmeadow Project #1018-79; February 14, 1979.

Procedure: 5M, 5F, New Zealand white rabbits (2.5 - 2.9 kg) with abraded skin received an application of 2000 mg/kg of test material (HG 78225) with 24 hours occluded exposure. Animals were observed for 14 days post-exposure, survivors were sacrificed and all were subjected to necropsies.

Results: Symptoms included decrease in activity, few feces, little or no urine, and diarrhea. Erythema seen through day 13; average score was 1.12. Edema observed through day 14; average score was 1.27. During study 1/5M died; necropsy revealed diarrhea, gastrointestinal tract distended with gas and yellow liquid, clear gel in colon, and discoloration of cecum. All surviving animals exhibited no observable abnormalities. LC is greater than 2000 g/kg.

Study Classification: Core Guideline Data.

Toxicity Category: III - CAUTION

14. Acute Inhalation Toxicity Study in Rat; IR&D #383-065; March 23, 1979

Procedure: Two groups of 6M (254-292 g) and 6F (222-274 g) Charles River CD strain rats were exposed to nominal concentrations of Conquer LVK. The aerosol concentrations whee 21.89 and 30.72 mg/l with an equivalent aerodynamic diameter of 2.4 micrometers and a geometric standard deviation of 1.78. Exposure was for 4 hours. Animals were observed for 14 days post - exposure. At termination of study, survivors were sacrificed and all subjects underwent necropsies.

Results: At 21.89 mg/l, 2/6F died. At 30.72 mg/l, 1/6M and 2/6F died. The combined M, F LD₅₀ was calculated to be 41 mg/l. Hourly air samples tested by Ciba-Geigy showed that at a nominal concentration of 21.89 mg/l, the atmospheric concentration of the formulation was between 16.0-16.9%; at a nominal concentration of 30.72 mg/l, the atmospheric concentration of the formulation was 9.8-11.0%.

Symptoms included nasal discharge, salivation, eye squint, dyspnea, ataxia, prostration, blood around eyes and tremors. Necropsis of survivors showed no gross pathological alterations. Necropsies of animals that died revealed dark red patches on lungs, scattered black pinpoints on stomach mucosa and dark pink lungs.

Study Classification: Core Guideline Data.

Toxicity Category: III - CAUTION

15. Primary Eye Irritation Study in the Albino Rabbit; IR&D #382-041E; October 12, 1978.

Procedure: 0.1 ml of test material (HG 78225) was applied into one eye of each of 6 New Zealand white rabbits, 6 unrinsed and 3 rinsed. Rinsed eyes were treated with test material and then rinsed with 300 ml of lukewarm water for approximately 1 minute, 30 seconds post-treatment. Scoring at 1, 24, 48, 72 hours, 7 and 14 days.

Results: The unwashed eyes showed corneal dulling in 3/6 at 1 hour, 4/6 at 24 hours, 1/6 at 7 days; all corneas appeared normal by day 14. Iris irritation in 6/6 at 1, 24 hours; 1/6 with iris irritation at 7 days; all irises appeared normal by day 14. Conjunctival redness was slight in 6/6 at 1, 24 hours; 1/6 with slight redness at 7 days; all redness gone by day 14. Swelling chemosis in 6/6 very slight to slight at 1, 24 hours; 1/6 slight at 7 days; all swelling gone by day 14. Discharge observed in 6/6 as moderate to marked at 1 hour; at 24 hours, no discharge; at 72 hours, 1/6 showed slight discharge; no discharge by day 7. Symptoms included clear discharge, purulent discharge, conjunctival blanching, petite hemorrhage or the conjunctivae, corneal pitting and vocalization upon dosing.

In the washed eyes, all cornea scores were zero; no iris irritation. Conjunctival redness was slight in 3/3 at 1 hour; 1/3 showed slight redness at 24 hours; all redness gone by 48 hours. Swelling chemosis was very slight to slight in 3/3 at 1 hour; all swelling gone at 24 hours. Discharge was marked in 3/3 at 1 hour; no discharge at 24 hours. Symptoms included clear discharge, corneal pitting, and conjunctival blanching.

Study Classification: Core Guideline Data.

Toxicity Category: II - WARNING

16. Rabbit Eye Irritation; Stillmeadow Project #1019-79; February 14, 1979.

Procedure: 0.1 ml of test material (HG 78225) was applied into one eye on each of 9 New Zealand rabbits, 6 unrinsed and 3 rinsed. The rinsed eye group was treated with the test material and then rinsed with deionized water at room temperature for 1 minute, 30 seconds post-treatment. Scoring at 24, 48, 72 hours, 4, 7, and 14 days.

Results: In unwashed eye group, corneal dulling observed in 2/6 at 24 hours; all clear by day 7. Iris irritation in 3/6 (scores = 1-2); all clear by day 7. Conjunctival redness very slight to moderate in 6/6 at 24 hours; at 7 days, 2/6 were very slight; all normal by 14 days. Swelling/ chemosis is slight to marked in 6/6 at 24 hours; very slight to slight in 4/6 at 7 days; very slight to slight in 2/6 at 14 days. Very slight to slight discharge seen in 6/6 at 24 hours; no discharge by day 7. At instillation 3/6 vocalized.

Washed group had no corneal or iris irritation. At 24 hours, 3/3 showed very slight to slight conjunctival redness; all normal by day 4. Swelling of chemosis at 24 hours in 3/3 ranging from very slight to slight; all normal by day 4. No discharge observed.

Study Classification: Core Guideline Data.

Toxicity Category: II - WARNING Irritation persisted 7 days.

17. Rabbit Primary Skin Irritation; Stillmeadow Project #1020-79; February 14, 1979.

Procedure: 0.5 ml of test material (HG 78225) was applied to each of 4 sites (2 abraded, 2 intact) on each of 6F New Zealand white rabbits. The exposure was for 24 hours under occlusive wrap. Draize scoring at 24, 72 hours.

Results: Erythema and eschar scores at 24 hours at the intact sites were 1/12 = 1; 9/12 = 2; 2/12 = 3. Erythema and eschar scores at 72 hours, intact sites, were 7/12 = 1; 3/12 = 2; 2/12 = 3. Edema scores at 24 hours, intact sites, were 10/12 = 2; 2/12 = 3; at 72 hours 7/12 = 1; 3/12 = 2; 2/12 = 3.

Erythema and eschar scores at 24 hours, abraded sites, were 10/12 = 2; 2/12 = 3; at 72 hours, 4/12 = 1; 6/12 = 2; 2/12 = 3. Edema scores at 24 hours for abraded sites were 6/12 = 2; 6/12 = 3; at 72 hours, 4/12 = 1; 6/12 = 2; 2/12 = 3. Primary Irritation Index was 4.05.

Study Classification: Core Guideline Data.

Toxicity Category: III - CAUTION

Conquer[®] liquid vegetation killer

Gallons

U.S. Standard Measure

For total vegetation control

Prevents plant growth for up to one year

Active Ingredients:
Prometon: 2,4-bis (isopropylamino)-6methoxy-s-triazine 2.50%
Pentachlorophenol 1.00%
Other chlorophenols and related compounds 0.12%
Inert Ingredients: 96.38%
Total: 100.00%

DANGER:

Keep Out of Reach of Children.

For total vegetation control on certain areas around the home where no plant growth is desired, as specified in label directions.

Controls johnsongrass, bindweed, and other hard-to-kill weeds. Prevents plant growth for up to one year.

Conquer Liquid Vegetation Killer is a nonselective product intended for use after dilution with water. For best results, apply to bare ground or when vegetation growth is just starting. Vegetation taller than 4-6 inches should be hoed before treatment or it may be

necessary to make a second application. A second application may be necessary to control deep-rooted perennial weeds. Use for bare ground vegetation control in driveways, brick walks, paths. patios, parking areas, play areas, along fences and curbs, around buildings, and under graveled pathways where plant growth has come through these surfaces.

Directions for Use

Apply with a sprinkling can. To cover 50 sq. ft. add 16 fl. oz. to sprinkling can containing 2½ gals. of water. When sprinkling can is empty, triple rinse and pour rinses on area just treated. Mix only the quantity needed and use immediately. Do not store dilute solution. To minimize lateral movement, sprinkle in lightly with a watering can immediately after application.

Make application when air is calm to avoid the possibility of drift onto desirable plants or grass. Keep away from the roots of desirable plants. Use only in areas where complete control of all vegetation is desired. Conquer Liquid Vegetation Killer should not be used on cultivated areas, on ground that is to be cultivated, in greenhouses, or near the drip line of trees or shrubs. Do not use on slopes or in areas where runoff is likely to occur (apply only to level surfaces). Avoid using where adjacent desirable trees, shrubs, or plants may be injured from leaching of the chemical through the soil. Keep children and animals off treated areas until these areas are dry. Apply this product only as specified on this label.

Storage and Disposal

Reseal container and offer for reconditioning, or triple rinse (or equivalent) and offer for recycling, reconditioning, or disposal in approved landfill, or bury in a safe place.

Precautionary Statements

Hazards to Humans and Domestic Animals

DANGER

Corrosive; causes eye and skin damage. Do not get in eyes, on skin or clothing. Wear goggles or face shield and rubber gloves when handling. Harmful if swallowed, inhaled or absorbed through the skin. Do not contaminate food or feed.

First Aid: In case of eye contact, wash with water for at least 15 minutes and seek medical attention. In case of skin contact, wash with plenty of soap and water. In case of inhalation exposure, move from contaminated area. If swallowed, do not induce vomiting; get medical attention immediately.

Note to Physician: There is no specific antidote; if ingested, do not induce emesis, and take care to avoid aspiration of stomach contents during gastric lavage. Give a saline laxative and supportive therapy.

Environmental Hazards

This product is toxic to fish. Keep out of any body of water. Do not contaminate water used for irrigation or domestic purposes. Do not contaminate water by cleaning of equipment, or disposal of wastes. Apply this product only as specified on this label.

Physical or Chemical Hazards

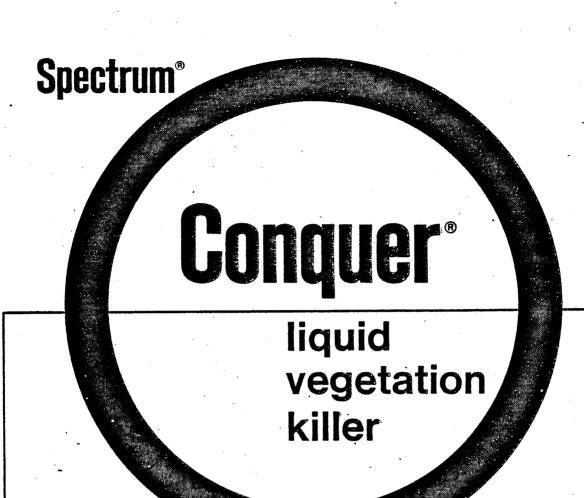
Do not use, pour, spill, or store near heat or open flame.

Spectrum* and Conquer* trademarks of CIBA-GEIGY
Spectrum Home and Garden Products
Agricultural Division
CIBA-GEIGY Corporation
Greensboro, North Carolina 27409
CGA 45L7A

EPA Reg. No. 100-582

Sept. 15, 1918 10-582 CIBA-GEIGY

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For total vegetation control

Prevents plant growth for up to one year.

Danger:

Keep out of reach of children.

See additional precaution statements on back of container.

Covers up to 400 sq. ft.

Active Ingredients: Prometon: 2,4-bis (isopropylamino)-6methoxy-s-triazine 2.50% Pentachlorophenol 1.00% Other chlorophenols and related compounds 0.12% Inert Ingredients: 96.38% Total: 100.00%

One Gallon

Conquer® liquid vegetation killer For use where no plant growth is desired



Parking areas



Play areas



Cracks, curbs and other areas

Use sprinkling can for application. Do not use in garden areas, lawns, greenhouses, foundation plantings, flower borders, around shrubs or plants, or adjacent to desirable trees.

Conquer® liquid vegetation killer For total vegetation control. Apply with sprinkling can.



Cracks in driveways



Cracks in brick walks and patios



Along fences and around posts

For total vegetation control on certain areas around the home where no plant growth is desired, as specified in label directions.

Controls johnsongrass, bindweed, and other hard-to-kill weeds. Prevents plant growth for up to one year.

Conquer Liquid Vegetation Killer is a nonselective product intended for use after dilution with water. For best results, apply to bare ground or when vegetation growth is just starting. Vegetation taller than 4-6 inches should be hoed before treatment or it may be necessary to make a second application. A second application may be necessary to control deep-rooted perennial weeds. Use for bare ground vegetation control in driveways, brick walks, paths, patios, parking areas, play areas, along fences and curbs, around buildings, and under graveled pathways where plant growth has come through these surfaces.

Directions for Use

Apply with a sprinkling can. To cover 50 sq. ft. add 16 fl. oz. to sprinkling can containing 2½ gals. of water. When sprinkling can is empty, triple rinse and pour rinses on area just treated. Mix only the quantity needed and use immediately. Do not store dilute solution. To minimize lateral movement, sprinkle in lightly with a watering can immediately after application.

Make application when air is calm to avoid the possibility of drift onto desirable plants or grass. Keep away from the roots of desirable plants. Use only in areas where complete control of all vegetation is desired. Conquer Liquid Vegetation Killer should not be used on cultivated areas, on ground that is to be cultivated, in greenhouses. or near the drip line of trees or shrubs. Do not use on slopes or in areas where runoff is likely to occur (apply only to level surfaces). Avoid using where adjacent desirable trees, shrubs, or plants may be injured from leaching of the chemical through the soil. Keep children and animals off treated areas until these areas are dry. Apply this product only as specified on this label.

Storage and Disposal

Do not reuse empty container. Wrap container and put in trash collection.

Precautionary Statements

Hazards to Humans and Domestic Animals

DANGER

Corrosive; causes eye and skin damage. Do not get in eyes, on skin or clothing. Wear goggles or face shield and rubber gloves when handling. Harmful if swallowed, inhaled or absorbed through the skin. Do not contaminate food or feed.

First Aid: In case of eye contact, wash with water for at least 15 minutes and seek medical attention. In case of skin contact, wash with plenty of soap and water. In case of inhalation exposure, move from contaminated area. If swallowed, do not induce vomiting; get medical attention immediately.

Note to Physician: There is no specific antidote; if ingested, do not induce emesis, and take care to avoid aspiration of stomach contents during gastric lavage. Give a saline laxative and supportive therapy.

Environmental Hazards

This product is toxic to fish. Keep out of any body of water. Do not contaminate water used for irrigation or domestic purposes. Do not contaminate water by cleaning of equipment, or disposal of wastes. Apply this product only as specified on this label.

Physical or Chemical Hazards
Do not use, pour, spill, or store near
heat or open flame.

EPA Reg. No. 100-582

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